Transport Assessment - reliability for decision-making

My conclusion about the transport assessment is that it is incomplete and severely flawed. It is not fit for purpose to inform the decision-making and needs to be done properly. This is important in itself. The transport assessment's findings also feed the most important documents (including the planning statement and the environmental assessment) in some important ways. I think the assessment has been rushed or not funded enough. Its findings and flaws are material to assessing the sustainability of the site (including its non-compliance with policies TR1, TR3 and TR6 of the December 2024 National Planning Policy Framework, NPPF), the design of the access arrangements at the A22, the operation of the A22 in the agreed study area and any requirements for the funding of off-site highway works.

I consider the scale of reduction to the forecast vehicle trips that is made in the assessment and attributed to the proximity of the site to South Godstone primary school is wrong. The consequence of this wrong assumption is that the give-way access out of the main side of the development is assessed as just working in the morning peak, whereas with real numbers it would fail badly then and may do in the evening peak. The numbers mean the effects of the proposed development due to extra vehicles are underplayed offsite everywhere there has been an assessment.

The assessments of the A22/Bone Mill Lane roundabout and M25 junction 6 are built from the traffic patterns of earlier this year with the closure of the A25 at Godstone due to the sinkhole in place. The assessments even with the artificially low development-related numbers show long queues increasing a lot. These findings are then dismissed as being because of the sinkhole closure. A proper assessment would have compensated for the sinkhole closure.

At M25 junction 6, the scale of the development's effect has been under-estimated further due to an allocation of a low proportion of the development's car traffic into the junction and the under-calibration of the junction model (which produces shorter queues on the southern approaches than observed when it is run on existing traffic flows). The assertion that any development effects can be accommodated by changing signal settings at junction 6 is unsubstantiated and the signals should be running at maximum capacity already.

The transport assessment has not attempted to assess the operation of the A22/A25 roundabout, which is a critical junction on the A22 short of the M25 junction 6. I anticipate its capacity issues are worse than A22/Bone Mill Lane in the without sinkhole closure situations. There has also been no assessment of whether the extra site traffic would result in capacity and hence safety risks related to traffic turning out of the side roads in South Godstone onto the A22. One side road accesses the primary school, which as a consequence of the development may well have a two form entry drawing in more children from outside the existing village plus site through that access. There has been no modelling of the poor A22/Hart's Lane/Miles Lane junction. I believe all these issues are in the scope of the brief for the application's assessment which Tandridge sent to the applicant.

There are significant inaccuracies in the description of the frequency of the services from Godstone railway station, the journey times to London and the destinations of bus services. I also consider the travel plan and very limited off-site highways/transport route works offered would make very little difference in practice, despite the considerable prominence they are

given. The documents also suggest the development is more accessible to a range of non-car transport methods than it is.

Transport options for travel arising from the development

1. The location of the development makes it unlikely that many of its residents will access jobs, services and shopping by walking, cycling or public transport. It would be car-dependent development, whatever internal layout is built in the development site.

2. There are limited facilities in South Godstone for people to access including by walking and you cannot walk or cycle anywhere else except along the A22 which will continue to have a narrow pavement to reach anywhere else.

More on points 1 and 2
I note that the development is next to the existing primary school and that a small parcel of land is being made available to enable the school to expand (and if it does accommodate children from the development and outside South Godstone village). This is pretty much it for sustainable transport to off-site destinations. Other opportunities are very limited with very few other facilities to walk to in South Godstone village, walking or cycling further involves using the A22 (including narrow pavements and switching sides twice to reach Godstone village) and there is limited public transport. This is why there are few new developments attached to very small settlements - sites of several hundred houses being more common at the edge of larger settlements. It is difficult to provide a good range of destinations accessible in a way that would get people not to travel by car.

It is to be hoped the non-residential element of the development includes a food store, but it could instead consist exclusively of other things such as warehouses, offices or even a local distribution centre. The commercial case for a convenience food store is not by any means guaranteed - and for example the far larger Godstone village has very limited food shopping.

3. The railway is a low frequency shuttle between Tonbridge and Redhill. There are no plans to change that. The weekday bus service does not generally go to the service towns of Oxted and Redhill.

More on point 3
The weekday railway service at Godstone station has 24 departures each way, 20 of which are in the 16 hours from 6am to 10pm. In each direction and in each of the three hour peak periods (from 7am to 10am and 4pm to 7pm) there are 4 unevenly spaced departures. Some timings are in place for school traffic (particularly flows between Edenbridge and Tonbridge). The latest statistics published by the Office of Rail and Road indicate the station is the 1,931st busiest of 2,589 in Great Britain.

There are no direct public bus services between South Godstone and Redhill. The latest bus to Oxted from South Godstone leaves South Godstone before 7am. The first return bus arrives at 7pm.

Access arrangements on the A22 for the development

4. All the motor traffic from the 400 houses and other development east of the A22 would have to access anywhere else via a give way junction, with the 100 houses west of the A22 accessing nearby. This is not going to work because the A22 is busy in peak periods. If and when it does not work it would be a safety problem.

More on point 4
The developer's own transport assessment indicates that the assigned flow of vehicles which seek to leave the eastern part of the development and turn right onto the A22 northbound would be at 85% of capacity in the morning peak hour when the development is finished. 85% is the level when a junction is about to routinely run out of capacity. If it is exceeded assessments will show significant queuing and delays, which could then trigger motorists taking risks when turning into traffic.

But the developer's assessment relies on the motor traffic being almost halved in the morning peak out compared to the sites the developer used to forecast the traffic. This reduction is excessive and it is very likely the junction would not work in the morning peak. It is possible it would also fail in the evening peak. Other junction arrangements could be considered but this is the arrangement proposed in this application and is not a reserved matter to amend later.

The motor traffic reduction assumed by the developer is excessive for several cumulative reasons (basically the unreduced numbers have some journeys on foot already, vehicle and person journeys are mixed up and journeys involving secondary schools children and young adults are reduced).
- The unreduced figures from the other sites include people not using cars. The information about the six comparator site locations in an appendix of the developer's transport assessment indicates two locations with primary schools on site (0.2 to 0.4 miles from the site postcode), three more in larger built-up areas in walking distance of primary schools (about 0.9 to 1.1 miles) and the other 1.3 miles from a primary school with a dedicated walking/cycling route.
- The assessment applies a percentage reduction to vehicle journeys, whereas the number applied is relevant to person journeys. This is excessive because an average morning peak school journey by car to a primary school has more people in a car than the other morning peak car journeys leaving houses (as almost by definition there must be at least one child passenger in a car, whereas many people drive to work alone).
- The data sourced for the reduction also indicates that car journeys to secondary schools for children aged 11 to 16 are about 50% of the level of those of primary school children. But the reduction is applied to all educational trips, which also includes trips by young adults.

5. I am concerned about the proposed location and design of accesses from the development to the A22. These would be busy give way junctions with ghost islands on and off a busy and important "A" road, designated as part of the national primary route network (which is designed and intended to take most non-local traffic). The accesses on each side of the road are close together and on a significant gradient on the A22 near to a crest and bend in the A22. The existing queuing and safety issues at nearby junctions on the A22 such as with Tilburstow Hill Road, Hart's Lane/Miles Lane and within South Godstone village plus significant exceedances of 30 and 40 mph speed limits (included measured in SpeedWatch surveys) on the A22 are relevant.

More on point 5
The junctions do not meet the full relevant design standards assuming a 60kph design speed is appropriate. For example the gap between the two side accesses is less than the standard and they are in a poor location on the A22 given the gradient. There may be more issues, for example with visibility which featured in the safety audit of the accesses for the developer. The ramped approaches on the side roads while good in some ways may restrict capacity and compromise the operation of the accesses more. The operation of the signalled crossing in the middle of the two accesses may be a complication (although I understand why it is there in this type of design). The signalled crossing may not be enough to reduce traffic speeds to be consistent with a 60kph design speed.

The developer may be able to have a junction that works designed, especially as they control land north of the site. But that is for the applicant to consider and justify in another application, appreciating a different junction may throw up different compromises and problems.

Off-site highways issues

6. The M25 junction 6 and A22/A25 roundabouts are overloaded during peak periods. This development will exacerbate the failures and the extra traffic will add disproportionately to queuing and delays. No off-site works have been offered to deal with these consequences of the development. The transport assessment has not considered the A22/A25 roundabout and is inadequate for M25 junction 6. So there is not adequate information to consider these effects of the planning application.

7. I am concerned about the development leading to significant extra traffic turning at the poor and unsafe A22/Hart's Lane/Miles Lane junction. Volumes making the particularly bad right turn from the A22 to Miles Lane are likely to be increased a lot due to traffic from the development making the turn and the extra delays on the A22 to the north leading to other traffic using the route. The route continues on poorly suited roads including through Tandridge village. These points are not considered in the developer's transport assessment.

8. It is difficult to get out of the existing roads in South Godstone at peak periods. Can the turn out of Harcourt Way cope with the development's extra traffic extra traffic plus movements from outside the village and development attracted to the expanded school which would be a consequence of the development? It has not been assessed.

More on point 8
Any planning for the school expansion is not being done in this planning application. But an expanded primary school is integral to the developer's sustainable travel options such as they are. If the school is not expanded primary school children are liable to be driven somewhere else out of the development and in time when parents living in the development have children at the normal entry age for the primary school , this could apply to some children living in houses in the existing village. If the A22/Harcourt Way junction cannot operate safely and adequately it would need to be remodelled. This could be an extensive piece of work, for example involving traffic lights which would probably need to extend to the Woodlands Drive arm. If this is not funded by the development it is unlikely to happen and there may be no

school expansion. This issue should be considered in the assessment of this development's consequences.